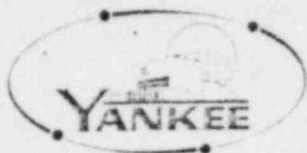
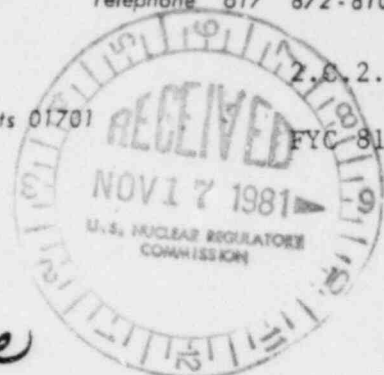


YANKEE ATOMIC ELECTRIC COMPANY

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United States Nuclear Regulatory Commission
Secretary of the Commission
Washington, D. C. 20555

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Attention: Docketing and Service Branch

OFFICE OF SECRETARY
DOCKETING & SERVICE
emp

Subject: Comments on Proposed Revision 2 to Regulatory Guide
(Task OP 031-4) "Instruction Concerning Prenatal Radiation
Exposure"

Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the subject proposed Regulatory Guide. Yankee Atomic owns and operates a nuclear power generating plant in Rowe, Massachusetts. The Nuclear Services Division also provides engineering services for other nuclear power plants in the Northeast including Vermont Yankee, Maine Yankee and Seabrook 1 and 2.

We suggest the section entitled "Your Additional Rights as a Worker" (pages 8.13-6 and 8.13-7) be deleted. It is unclear and not pertinent to the stated objectives of the Regulatory Guide. Further, we are concerned about workers misinterpreting this section and the resulting impact.

On page 8.13-7, the sentence, "Other factors in the mother's life. . .6 out of 100 birth defects" should be deleted or clarified to be more specific and be tied to a specific reference like all other sentences in the paragraph. As written, the sentence may be interpreted by some to mean 6 of 100 birth defects are caused by background radiation, others may conclude no birth defects due to background radiation.

Should you have any questions regarding our comments, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

D.W. Edwards

D. W. Edwards, Director
Operational Projects & Licensing

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11/9/81 emp

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